

We are a small WISP in the Northwest Florida panhandle who has been providing services to the small business and residential community since 1999 using the unlicensed ISM band. This past Fall, we expanded our services to the rural areas of adjacent Walton County in response to many underserved residents and businesses.

These folks have been ignored by the larger telecom and cable providers with regard to broadband communications for years. The population density is low and profitability not consistent with the return on investment requirements of larger entities.

With respect to the proceeding listed above, we submit that if anything is to be changed within the unlicensed spectrum allocation, it should be to expand the allocation. Clearly, only small independent WISPs have the inclination, desire, or motivation to solve the communications needs of underserved areas such as ours.

The Commission has traditionally expanded the availability of unlicensed spectrum, confident that opening spectrum to unlicensed use stimulates further innovation. Time and again, the virtuous circle of spectrum allocation followed by innovation and consumer demand has demonstrated the wisdom of the Commission's trust in unlicensed access spurring innovation and, more importantly, solutions.

We respectfully petition the FCC to EXPAND the unlicensed allocation to provide more quality competition and entrepreneurial innovation and turn a deaf ear to those looking to further throttle the small guy who TRULY has the interest of their friends and neighbors at heart.

As a closing thought, I recall the ruling to release public telephone services from regulatory oversight some years ago. The change was not to cost the consumer more or adversely affect service. As a result, cost per call went up immediately by over 30%, the quality of service and maintenance became deplorable. The large telco argument NOW is that wireless cell services make the pay phone obsolete. The results in a move to completely eliminate millions of these devices from the access of those who can not afford cell phones or landline services.

Respectfully,

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